

SAMPLE PROGRAM

*The parts in italics are written
as an example, they are
not OSHA requirements*

Developed by the
Arkansas Department of Labor
OSHA Consultation / Industrial Hygiene

HAZARD COMMUNICATION PROGRAM

I. PURPOSE

The purpose of this program is to establish guidelines that will ensure the hazards of all chemicals used within Acme Parts Co. Inc. are evaluated and that this hazard information is transmitted to all affected employees.

II. HAZARDOUS CHEMICAL INVENTORY

A list of all hazardous chemicals at the facility will be compiled. The name of the chemicals on this list will match the name of the chemicals on their corresponding material safety data sheet (MSDS). The list will be kept:

1. *in the MSDS book in the employee break room*
2. *in the Safety Coordinators office*

The person responsible for updating the chemical inventory list whenever new hazardous chemicals are purchased, used, or manufactured at the facility is:

D. J. Smith, Safety Coordinator

III. MATERIAL SAFETY DATA SHEETS (MSDS's)

Material safety data sheets will be maintained for all chemicals at the facility. MSDS's for chemicals currently in use will be maintained in:

1. *the MSDS book in the employee break room*
2. *the Safety Coordinators office*

Purchasing Manager is responsible for receiving and reviewing all MSDS's. The method to be used to review MSDS's is described below:

1. *When MSDS's are received they will be compared with the old MSDS and any changes in safety or health hazards will be noted.*
2. *If the MSDS is for a new chemical, copies will be placed in the MSDS books in the facility and the Training Coordinator will be notified that training may need to be conducted on the new chemical.*
3. *If the MSDS is an updated version of one already in the MSDS book, the old MSDS's will be removed from the books in the facility and placed in the "Retired MSDS's" file. Copies of the new MSDS's will be placed in the MSDS books in the locations listed above.*

4. *The Purchasing Manager will inform the Safety Coordinator and Training Coordinator of (1) changes that need to be made to the labels and (2) employee re-training to reflect the updated hazard information.*

Employees can have access to the MSDS's Looking in the MSDS book in the break room, Asking their supervisor or the safety coordinator.

When an MSDS is not received with a new chemical at the time of shipment Purchasing Manager will follow the steps listed below:

1. *Immediately call the supplier and request a copy of the MSDS (by fax or mail).*
2. *Put a hold on using the chemical until the MSDS is received and employees have been trained on the chemical (if this chemical introduces a new hazard).*

When new and significant health information is found on a MSDS D. J. Smith, Safety Coordinator will follow the procedures listed below:

1. *Inform the Training Coordinator of the new information and assure that a training class is conducted with all affected employees immediately.*
2. *Assure that the Purchasing Manager has changed all old labels and replaced the MSDS in the books.*

IV. LABELING

Every container of chemicals in the facility will be labeled with the following:

1. The name of the chemical (product name), and
2. The appropriate hazard warning (how the chemical can hurt employees who use it).

The labeling used in the facility will consist of written labels affixed to each container, when possible. Labels are not required for portable containers intended for the immediate use (no longer than one shift) of a single employee – if all contents are used or put back in the original labeled container at the end of the job or shift.

Containers that cannot actually have a label physically placed on them will be labeled in the following manner:

1. *Signs will be posted in the area of stationary welding for the rods and metals.*
2. *Signs will be posted on the wall behind the washing and plating tanks.*
3. *A flow chart of chemicals and their hazards will be in the operator booth for the chemicals contained in the large chemical mixing tanks.*
4. *Batch tickets will be included in the container for batches of parts that cannot be labeled.*

Purchasing Manager is responsible for ensuring that all chemical containers are adequately labeled before they are released to be used in the facility.

Safety Coordinator is responsible for updating all containers when new and significant health hazards are identified.

Department Supervisors are responsible for ensuring that all chemical containers in their departments are properly labeled.

V. TRAINING

Each employee who uses chemicals will be given training **before** working with the chemicals. Employees who transfer to another job where chemicals are new to their work experience will be trained before they begin work in that area.

Training Coordinator will be responsible for assuring that all the required training is given before employees begin work and annually thereafter.

The following elements will be included in the training program:

1. The requirements of the hazard communication standard;
2. The operations in their work area where hazardous chemicals are present;
3. The location and availability of this hazard communication program, the chemical inventory list, and the MSDS's;
4. The methods and observations employees can use to detect the presence or release of a hazardous chemical in the work area;
5. The physical and health hazards of the chemicals in the work area;
6. The measures employees can take to protect themselves from these hazards (such as safe work procedures, personal protective equipment, emergency procedures, etc.);
7. The details of this hazard communication program, including an explanation of the labeling system used, how to read MSDS's, and how employees can obtain and use the hazard information.

VI. HAZARDS OF NON-ROUTINE TASKS

When employees are required to perform a non-routine task using a non-routine chemical (i.e. a chemical not used in 3 or 4 months or more), they will be informed of the hazards by Safety Coordinator. The employee will be informed of the hazards of the chemicals, the procedures to use to safely complete the job, and the personal protective equipment to be used (and how to correctly use it).

The following is a list of non-routine tasks that may be conducted at this facility:

1. *Cleaning out vapor degreaser*
2. *Unclogging sludge pit lines*
3. *Cleaning out plating tank*
4. *Repairing leaks to roofs*
5. *Repairing piping system*
6. *Welding in a confined space*
7. *Repainting delivery trucks*

VII. ON-SITE CONTRACTORS

On-site contractors will be informed of the hazardous chemicals they may encounter at this facility and be given access to the corresponding MSDS's.

Safety Coordinator is responsible for:

1. Determining what chemicals and activities the contractor will be using and performing in this facility;
2. Verbally informing the contractor of the hazardous chemicals in the area in which they will be working and the location of the corresponding MSDS's;
3. Determining what chemicals and procedures the contractor will be using in the facility; and
4. Assuring the contractor does not bring any hazardous materials into the work area until those chemicals have been approved for use in the facility.

VIII. EVALUATION AND REVIEW

This program will be reviewed and updated at least annually to determine if the procedures listed are being followed at the facility. Updates will be made to reflect new chemicals and procedures that affect employee exposure.

Safety Coordinator is responsible for annually reviewing and updating this program.